

April 6, 1998

C.R. Henry Co.  
381 Horseshoe Pike  
Lebanon, Penna. 17042

6041 '98 APR 27 A9:52

Dear F.D.A.,

*We understand that there will be a vote regarding this Produce Guidance Issue. It is our understanding that within the scope of this issue, there will be a vote as to the re-use of wooden, wire-bound crates. We are very concerned that a vote may take place without all the pertinent facts being on the table. In the U.S.A., the Agricultural Industry has been using once-used containers for 60-70 years without any repercussions. It concerns us that you even know that the Industry has been recycling within itself for decades.*

*Many of the Agricultural Crate Dealers are located here on the East Coast. Us Dealers, are centered from Florida on up the Eastern Seaboard to New Jersey and New York. We perform a very valuable service to the grower and in turn the housewife that buys the produce. When the grower can use a once-used container, he saves about half the cost of the new container. Just when everyone is recycling, we hear rumblings that we need to dis-allow the re-use of produce containers.*

*As Dealers, we are all aware of the NAFTA footprint on our own system. In time, maybe this agreement can work, but for now, please don't penalize us and our system that has worked for years. We need to educate these other countries about the fertilizers and pesticides that are safe. We feel that the problem started with this issue with outside countries that export produce items to the U.S.*

*The trees that our Industry saves by recycling each year, saves millions from being harvested. Depending on the box to be manufactured, it takes one tree to make 175 to 225 boxes. Only the first 10 to 14 foot of the tree is utilized for the production. Our industry has been ahead of the Nation for Decades, because we have been re-using the containers over and over again.*

*Many Growers will tell you that sometimes the profit they make is the difference between the cost of the new containers and the recycled one. It goes without saying, that it is evident, that if required to purchase new, the produce pricing would increase drastically.*

*We need your help for our voices to be heard. We need to solicit your help. Most people do not know that this recycling system exists. We have been recycling before the word was even used in the common household. If it is not broken, please do not attempt to fix it. Please call us at 717-273-0968 (Russ)*

97N-0451

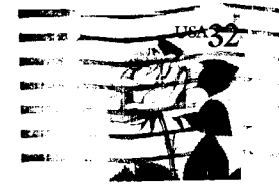
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*Sincerely,*

*Russell Henry*

*Russell Henry*

**C. R. HENRY**  
381 Horseshoe Pike  
Lebanon, PA 17042



Dockets MANAGEMENT Branch (HFA-305)  
Food + Drug Administration  
12420 PARKTAWN DR. Rm 1-23  
Rockville, Md. 20857 Docket # 97N-0451